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June 8, 2009

Hon. Sandra L. Townes  
United States District Court Judge  
Eastern District of New York  
U.S. Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re:** **United States of America vs. Mersim Kolenovic**  
**Criminal Docket No.: 08-916 (SLT)**

Dear Judge Townes:

I am respectfully requesting on behalf of my client, Mersim Kolenovic that the bail conditions be modified, so that he may travel outside the State of New York with his immediate family, which consists of his wife and son, as well as his parents to the State of Pennsylvania.

Mr. Kolenovic's parents, Etem & Veza Kolenovic have a summer home located at 164 Wilson Drive, Hazelton, Pennsylvania 18201, telephone number (917) 494-7415 or (917) 842-6212 and he, his wife and son would like to go to Pennsylvania from time to time from the beginning to the end of the summer to stay with his family.

Mr. Kolenovic has spoken with his Pre-Trial Officer, Robert Long at (718) 613-2681 and he advised that he has no objection to the same, but must call and advise him upon departing and returning and further that he must obtain consent from the Court.

If you have any questions, please feel free to call my office.

Permit to respectfully thank you in advance for your consideration in this matter.

Respectfully submitted,

*Jake LaSala*

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JL/sc  
cc: AUSA Steven Tiscione  
Pre-Trial Officer Robert Long